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June 11, 2021

SENT VIA ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Aviram Azari
1:19 Cr. 00610 (JGK)

Dear Judge Koeltl:

On behalf of my client Aviram Azari, and with the government's consent, we would most respectfully request that the conference scheduled for Monday, June 14, 2021 be rescheduled to a date between July 20th and July 23rd, or to a date thereafter convenient to the Court. Please accept my apology for the late request. I felt the submission of this request summarizing the parties' position would be more efficient than moving forward with the appearance and detailing the above to the Court.

I make this request because after a great deal of time and effort, and a coordinated review of extensive and complex discovery, and after related discussions with Mr. Azari, competently translated from English to Hebrew by Israeli Counsel, we are in a position to engage in meaningful plea discussions and negotiations with the Government.

Accordingly, given all of the above, we would request a month to engage in what we hope will be fruitful plea discussions. Should there not be a disposition, we would expect the Court to set a motion schedule at the next conference.

On behalf of Mr. Azari, we waive speedy trial time based on the reasons contained within this request and in the interests of justice.

The Court's consideration is greatly appreciated.

Respectfully,

/s/ Barry S. Zone

Barry S. Zone

cc: AUSA Olga Zverovich
AUSA Juliana Murry